

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In Re:

William C. Rasmussen
Karen L. Rasmussen

Case No.: 17-11816

Judge: Gravelle

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (**choose one**):

1. ☐ Motion for Relief from the Automatic Stay filed by _____, creditor,

A hearing has been scheduled for _____, at _____.

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____.

- ☒ Certification of Default filed by Albert Russo, Chap. 13 Trustee,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

☐ Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support is attached.

☒ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

When our Plan was first proposed, our proposed payment was lower. We made all payments. When the Plan was confirmed (nearly one year later), the Plan payment was much higher, and for 60 months, so we were substantially in arrears, based on that new payment amount, from the beginning. I believe we have missed only one pymt since then, due to unexpected expenses with our daughter's educ.

☒ Other (**explain your answer**):

We request an opportunity to put the Plan back on track. We propose to pay \$500 every two weeks beginning next week (i.e. \$13,000 per year, or an extra \$2800 in 12 months), plus an extra \$1000 when we get our income tax refund, until the Plan is back on track (which should take approx. 20 months total).

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 10/01/2018

/s/ William C. Rasmussen
Debtor's Signature

Date: 10/01/2018

/s/ Karen L. Rasmussen
Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.